It is axiomatic that the combination of cited references in a §103 rejection must disclose every element in the rejected claim. MPEP 2143.03. Claim 1 recites a method of graphics compression comprising the steps of:

"identifying the type of a set of setup variables;

modifying the set of setup variables by eliminating the type fields from the set of setup variables; and

bundling the modified setup variables into a packet of a corresponding predefined packet type."

As demonstrated below, Applicant respectfully submits that neither DULUK nor DEERING, or a combination of these references, discloses or suggests multiple steps as recited in claim 1.

1. The Modifying Step

Claim 1 recites the step of "modifying the set of setup variables by eliminating the type fields from the set of setup variables."

a. DULUK Does Not Disclose the Modifying Step

Applicant thanks the Examiner for acknowledging, in this Office Action, that DULUK does not disclose the modifying step, including modifying "by eliminating the type fields from the set of setup variables" as recited in claim 1.

b. DEERING Does Not Disclose the Modifying Step

The Examiner cited DEERING at col. 8, lines 33-40 for teaching eliminating a type field to conserve overhead. Applicant respectfully submits that DEERING does not teach or suggest eliminating type fields from a set of setup variables. In fact, DEERING teaches away from any elimination of type fields.

DEERING discloses a command preprocessor that converts each input vertex packet to a corresponding reformatted vertex packet. DEERING, col. 5, lines 46-59. "Header bits in each input vertex packet specify a replacement type. The replacement type defines the combination of a subsequent input vertex packet with previous input vertex packets to form a next triangle in the triangle strip." DEERING, col. 7, lines

63-68. During conversion of the input vertex packet to a corresponding reformatted vertex packet, the replacement type of the input vertex packet is converted to a restart replacement type (or replacement type restart – DEERING uses these terms interchangeably). DEERING, col. 8, lines 22-27.

However, DEERING does not teach an elimination of the restart replacement type. To the contrary, the restart replacement type is critical to the reformatted vertex packet – its presence reduces overhead required for starting a DMA sequence and the system disclosed in DEERING will not work if the restart replacement type is eliminated. "The restart replacement type … corresponds to a move operation for polylines [and] enables a single data structure to specify multiple unconnected variable length triangle strips …. Such a capability enables the representation of complex geometry in a compact data structure." See DEERING, col. 8, lines 34-48.

Based on the foregoing, Applicant respectfully submits that DEERING does not disclose or suggest the step of "modifying the set of setup variables by eliminating the type fields from the set of setup variables" as recited in claim 1. Further, Applicant respectfully asserts that DEERING teaches away from the method recited in claim 1. Thus, Applicant believes that claim 1 is in condition for allowance.

2. Neither DULUK Nor DEERING Discloses or Suggests the Bundling Step

a. The DULUK Reference

Claim 1 also recites the step of "bundling the modified setup variables into a packet of a corresponding predefined packet type." As shown in this Office Action (and on the previous page), the Examiner has conceded that DULUK does not teach or suggest the "modifying" step. It follows from principles of logic that DULUK also cannot disclose or suggest any step that refers back to "the modified setup variables." But this is exactly the subject matter of the current step. Hence, DULUK cannot disclose or suggest this step.

More specifically, the Examiner's cited portion in DULUK discloses a mode injection unit that "reconnects the VSP [Visible Stamp Portion – a 2x2 pixel area of an image] with its color, light and texture data retrieved from [a memory]" and sends

the information "in the form of a packet" to the next unit. DULUK, col. 20, lines 55-66.

The unit disclosed in DULUK does not bundle any "modified data" (e.g., modified setup variables). Instead DULUK discloses a unit that reconnects "existing data" (e.g., of a pixel unit) received from a previous unit (i.e., the cull unit) to "existing data" in a memory. See DULUK, col. 9, lines 6-17.

Further, DULUK does not bundle data into a corresponding predefined packet type. DULUK discloses a unit that sends data in a generic packet form, not of any "corresponding predefined packet type" as required by claim 1. See DULUK, col. 22, lines 50-60.

Based on the foregoing, Applicant respectfully submits that DULUK does not disclose or suggest the step of "bundling the modified setup variables into a packet of a corresponding predefined packet type" as recited in claim 1.

b. The DEERING Reference

DEERING teaches converting each input vertex packets into a corresponding reformatted vertex packet. DEERING, col. 5, lines 46-59. The packet conversion disclosed in DEERING has a one-to-one correspondence (i.e., each old packet is converted into a corresponding new packet). DEERING does not teach or suggest bundling multiple packets into a single packet.

Based on the foregoing, Applicant respectfully submits that neither DULUK nor DEERING, singly or in combination, discloses or suggests the step of "bundling the modified setup variables into a packet of a corresponding predefined packet type" as recited in claim 1. Thus, Applicant believes that claim 1 is in condition for allowance.

3. Claim 2

Claim 2 is dependent upon claim 1 and therefore should also be in a condition for allowance.

B. Claims 3-4

Independent claim 3 recites an apparatus comprising means for performing the steps as recited in claim 1. Based on Applicant's foregoing arguments with respect to claim 1, Applicant believes that claim 3 is patentable over DULUK and DEERING and should be in condition for allowance. Claim 4 is dependent on claim 3 and should also be in condition for allowance.

C. Claims 5-19

Applicant thanks the Examiner for allowing claims 5-19.

II. Conclusion

In view of the foregoing, it is respectfully submitted that the application is now in condition for allowance. Should the Examiner believe that a telephone interview would help advance the prosecution of this case, the Examiner is requested to contact the undersigned attorney.

Respectfully submitted,

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